

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

LEE SCHMIDT and CRYSTAL  
ARRINGTON,

Plaintiffs,

v.

CITY OF NORFOLK and MARK TALBOT,  
in his official capacity as the Norfolk Chief  
of Police,

Defendants.

Case No.: 2:24-cv-00621-MSD-LRL

Hon. Mark S. Davis

**DECLARATION OF JONATHAN KRAVIS  
IN SUPPORT OF FLOCK SAFETY'S MOTION TO INTERVENE**

I, Jonathan Kravis, hereby declare as follows in support of Flock Safety's Motion to Intervene Pursuant to Federal Rule of Civil Procedure 24:

1. I am a partner at the law firm of Munger, Tolles & Olson LLP ("MTO"), counsel for proposed intervenor Flock Group, Inc., doing business as Flock Safety ("Flock"). I have personal knowledge of the facts stated in this declaration and, if called as witness, could competently testify to them.

2. On February 25, 2025, Flock received letters from both the Plaintiffs and Defendants in the above-captioned case asking Flock to preserve certain documents related to this litigation. On March 5, 2025, Flock sent Plaintiffs a response to their preservation letter. I met and conferred regarding the preservation requests with counsel for the Plaintiffs on March 6, 2025, and with counsel for Defendants on March 7, 2025.

3. On March 14, 2025, Plaintiffs served a subpoena on Flock seeking production of documents under Federal Rule of Civil Procedure 45.

4. Attached hereto as **Exhibit A** is a true and correct copy of the March 14, 2025 Subpoena. The exhibit is partially redacted to omit sensitive information irrelevant to this Motion.

5. I have conferred with counsel for Plaintiffs regarding production of data and information requested by this Subpoena.

6. Plaintiffs have also asked whether MTO would agree to accept service of a subpoena to Flock seeking a deposition under Federal Rule of Civil Procedure 30(b)(6).

7. I have met and conferred with Defendants regarding this Motion. Defendants consent to Flock's motion to intervene.

8. I have communicated with Plaintiffs regarding this Motion on April 1, 2025 and again on the morning of April 3, 2025. Plaintiffs have not provided a position on the Motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed in Washington, D.C. on this 3rd day of April, 2025.

By:

  
Jonathan Kravis

Dated: April 3, 2025

Respectfully submitted,

/s/ Stephen E. Noona

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*Attorneys for Proposed Intervenor Flock  
Group, Inc., d/b/a Flock Safety*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of electronic filing to all counsel of record.

/s/ Stephen E. Noona

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